

Consultation on a new regulatory system including conditions of registration and funding

Do you have any further comments on the Statement of Intervention Powers?

QAA welcomes the clearer presentation of the range of intervention powers and the intention to operate a risk-based and proportionate approach. The inclusion of indicative timings for monitoring activity is also helpful, as it signals a more transparent and predictable regulatory cycle. It is encouraging to see a focus on early engagement with providers to support improvement before more formal action is required.

To strengthen confidence in the system and support providers in planning effectively, we think the following refinements would be beneficial:

- **Clearer distinction between monitoring and intervention**
The boundary between routine monitoring and formal intervention could be more explicitly defined, so providers understand when escalation has occurred and why.
- **More transparent thresholds for decision-making**
Greater clarity on the difference between minor non-compliance, non-compliance and serious non-compliance would support consistency and ensure providers can anticipate the likely regulatory response.
- **Visibility of governance and accountability**
Further detail on who within Medr makes decisions at each stage of escalation, including the roles of the Board and Quality Committee, would increase transparency and predictability.
- **Alignment of the monitoring cycle with provider operations**
The indicative calendar is positive, though further explanation of how it aligns with statutory and academic cycles and how risk-triggered activity interacts with planned activity would help providers prepare.
- **Positioning of Learner Protection Plans within the pathway**
Clarifying when and how these will be activated, particularly where risk emerges rapidly, would reinforce the focus on safeguarding continuity of study.
- **Applicability across partnership and varied delivery models**
More clarity is needed regarding accountability and how intervention powers will apply across collaborative, franchise and subcontracted provision, particularly where responsibility is shared between delivery and awarding bodies. This will help ensure learner protection is maintained regardless of delivery route.
- **Managing burden**
Clear communication on what will be expected within the Annual Assurance Return will be key to ensuring the framework remains proportionate and does not duplicate other regulatory demands.
- **Use of data during monitoring and intervention**
We welcome the emphasis on contextual interpretation of data. However, the delay to finalising performance indicators until 2027 introduces uncertainty on what will ultimately drive escalation decisions. Early guidance on the principles and sources to

be used would reduce the risk of misinterpretation and unnecessary burden.

Offering additional clarity in these areas would help ensure that the intervention powers support early dialogue, enhance trust and deliver the improvement-focused approach that the framework aspires to.

Do you have any further comments on the Regulatory Approach, in the context of the full set of regulatory documentation?

QAA welcomes the direction of travel toward a more proportionate and improvement-focused regulatory system. The documentation is more accessible than earlier iterations, and it is positive to see recognition that providers operate in diverse contexts and that existing external quality assurance processes, such as peer-led external reviews, have an important role in ensuring high quality higher education in Wales. The commitment to engagement and co-development with the sector is also encouraging.

To ensure the regulatory approach can be applied confidently and consistently across the tertiary system, we believe a number of areas would benefit from further refinement.

- **Ease of understanding and practical usability**
While the documentation is clearer, the structure does not yet give providers simplicity in understanding what is required of them. Many conditions include substantial repetition, and expectations are not always expressed in ways that enable providers to translate them directly into either policy or process.
- **A clearer line of sight between expectations, evidence and judgement**
Providers need to understand not only what they must do, but what evidence will be considered sufficient, who will review it, and how decisions will be made. The detail on those inter-related aspects is currently under-developed, which risks inconsistency and reduced confidence in the fairness of regulatory outcomes.
- **The Annual Assurance Return – sharing data for better regulatory oversight**
The Annual Assurance Return appears to be a central mechanism in demonstrating compliance across a wide range of conditions. However, its purpose, scope and evidence requirements could be more clearly defined. Furthermore, it is unclear how it will co-exist with other existing assurance and review activities. More clarity will be essential to ensure proportionality and avoid duplication with existing assurance and review activities.
- **Alignment with quality enhancement and externality**
QAA welcome the focus on continuous improvement, but the framework still reads primarily as a system of compliance. There is an opportunity to strengthen how external reference points, sector-led enhancement and peer input contribute to regulatory judgements and improvement.
- **Data as a driver of monitoring and escalation**
We support an approach in which data is used contextually rather than as an automatic trigger. At the same time, delaying performance indicators until 2027 creates uncertainty about how regulatory decisions will be informed in the early years. An approach to co-creation of performance indicators and early signalling of principles and likely priority measures would help the sector prepare confidently.
- **Partnership working and diverse provision**
The regulatory approach will need to make clear how responsibilities and expectations apply to emerging modes of delivery, such

as collaborative, franchised and subcontracted provision as well as micro-credentials, where participation is intended to grow. Providing early clarity on how compliance is demonstrated for shorter or more flexible learning would help ensure the framework remains future-proof and proportionate.

- **A transparent revision process for the conditions would be beneficial**
While we recognise the need to keep regulatory conditions under review, it would be helpful to outline how and when this will take place, and how sector feedback will inform future changes. Clear governance and timelines for revision will reduce uncertainty and support providers in embedding processes confidently.

Overall, we believe the framework is moving in the right direction, but greater operational clarity and stronger alignment between its components will be key to ensuring that providers understand what is expected of them, to avoid unnecessary burden and support high-quality outcomes for learners.

Do you have any further comments on the Monitoring Arrangements, in the context of the full set of regulatory documentation?

QAA welcomes the intention to adopt a monitoring approach that is proportionate, risk-based and focused on early engagement. The inclusion of indicative timings for routine monitoring activity also represents a helpful step toward transparency and predictability for providers.

To ensure the monitoring arrangements are fully workable across the sector, further clarification would be helpful in the following areas.

- **The role and expectations of the Annual Assurance Return**
The Annual Assurance Return appears to be the central mechanism through which providers will demonstrate compliance with multiple conditions. However, its scope, expected content and the criteria by which it will be assessed are not yet defined. Providers will need early clarity in order to plan proportionately and align this with existing assurance activities.
- **Distinguishing between monitoring and intervention**
It would be helpful to make clearer when routine monitoring activity becomes a signal of concern, and how severity or urgency of issues will be determined. Clear escalation points will support fairness, consistency and constructive provider engagement.
- **The purpose and operation of risk review**
References to a risk review process indicate that it will play a role in informing regulatory decisions, but its precise function, triggers and outcomes are not yet set out. Greater transparency here would strengthen confidence and help providers understand how monitoring information will be interpreted.
- **Early direction on the use of data**
We support the principle of contextual data use. To assist providers in preparing for future expectations, it would be useful to signal at an early stage the intended data sources, domains and measurement principles that will shape ongoing monitoring and performance discussions.
- **Proportionality and alignment**
As monitoring draws on a wide range of evidence sources, there is a need to ensure strong alignment with existing external quality review and provider self-evaluation, to

minimise duplication and avoid creating additional administrative burden.

Strengthening clarity in these areas would support a constructive monitoring culture that encourages early identification of risk, reduces uncertainty and enables continuous improvement.

Do you have any further comments on the Quality Condition, in the context of the full set of regulatory documentation?

QAA welcomes the intention behind the Quality Condition to secure high quality learning for all learners, and the recognition that providers will need to demonstrate both effective internal quality assurance and a commitment to continuous improvement.

At the same time, several aspects of the Quality Condition would benefit from further refinement to support clarity, proportionality and consistent application across the sector.

- **Clarity on expectations and evidence**

The language within the Quality Condition remains broad and, at times, difficult to translate into concrete provider actions. It would be helpful to set out more explicitly what the minimum expectations are, and what types of evidence are considered sufficient to demonstrate alignment. Without this, providers may risk over- or under-interpreting requirements.

- **Relationship between the Quality Condition and the Quality Framework**

There is currently a lack of clarity on how compliance with the Quality Condition is demonstrated through the Quality Framework and associated monitoring. Greater alignment between the Framework's pillars and the condition's requirements would help ensure operational coherence.

- **Role of externality**

The current drafting appears to take a narrow interpretation of externality as external review. It would be beneficial to more explicitly recognise the role of peer input, sector-recognised standards and external reference points as core features of robust quality assurance.

- **Reliance on the Annual Assurance Return**

The Annual Assurance Return is a key evidence route for this condition, yet there is limited detail on its structure, scope and assessment approach. Providers and other stakeholders, including quality bodies, would benefit from clarity early in the implementation period to avoid unnecessary administrative burden.

- **Governance and accountability**

While internal governance arrangements are referenced, the link to quality accountability at governing body level could be strengthened, ensuring that quality remains a core feature of institutional oversight and decision making.

- **Proportionality across delivery models**

Further guidance would be helpful on how the Quality Condition applies to partnership arrangements, shorter forms of provision and other delivery contexts where responsibilities may differ between institutions.

Welsh Language

Could this condition be applied consistently across all tertiary providers?

Yes

Are the requirements of the condition proportionate?

Yes

Does this condition provide sufficient clarity regarding requirements?

No

Learner Protection Plans

Could this condition be applied consistently across all tertiary providers?

Yes

Are the requirements of the condition proportionate?

Yes

Does this condition provide sufficient clarity regarding requirements?

No

Learner Engagement Code

Could this condition be applied consistently across all tertiary providers?

Yes

Are the requirements of the condition proportionate?

Yes

Does this condition provide sufficient clarity regarding requirements?

No

Validation Arrangements

Could this condition be applied consistently across all tertiary providers?

Yes

Are the requirements of the condition proportionate?

Yes

Does this condition provide sufficient clarity regarding requirements?

No

To what extent do you agree that the Validation Arrangements condition (which under the Act is defined as applying to validation arrangements only)

could be usefully extended into broader advice or guidance for tertiary partnerships, including sub-contractual arrangements?

Agree

Please provide comments to support your response, including any examples of potential impact, limitations or unintended consequences:

Extending guidance would be welcome, as the risks and safeguards required for validation are often also present in other partnership types. A more holistic approach to regulating tertiary partnerships would ensure consistent expectations across Wales. It would also support providers in applying coherent oversight arrangements, particularly where they operate multiple models of partnership or delivery through complex supply chains.

Any extension should, however, maintain clear boundaries about what is statutory and what is advisory. A flexible approach will be needed to account for the diversity of provision in Wales, including small specialist providers and work-based learning contexts.

Do you have any additional comments regarding the Conditions of Registration? Please indicate which Conditions you are referring to in your response:

QAA welcomes the direction of travel across the proposed Conditions of Registration and supports the emphasis on safeguarding learners, protecting standards and strengthening internal governance. The move towards a more coherent and transparent regulatory system is positive, and the focus on early engagement and continuous improvement aligns well with recognised quality assurance principles.

To support clarity, consistency and effective implementation, we offer the following cross cutting and condition specific comments.

A. Cross cutting considerations

Data sharing and alignment with quality processes

Evidence on compliance for many conditions is expected to be provided through the Annual Assurance Returns. Proportionate sharing of relevant elements of these Returns with QAA would strengthen triangulation across monitoring, review and enhancement. This would also support the effective delivery of Institutional Liaison Visits. Making such data sharing an explicit component of the new arrangements would enhance transparency and system coherence.

Clarity of evidence expectations

Providers will require early and clear guidance on what constitutes appropriate evidence for demonstrating compliance with each condition. Given the central role envisaged for the Annual Assurance Return, clarity on evidence expectations will be essential to avoid inconsistent interpretation and potential disproportionate burden.

Alignment with monitoring and intervention mechanisms

Several conditions refer to triggers or expectations linked to monitoring, but the wider mechanisms that will underpin these remain in development. Clear articulation of how risk reviews, ongoing monitoring, Institutional Liaison Visits, Concerns Investigations and Annual Assurance Returns relate to one another would support a predictable and proportionate regulatory approach.

Iterative improvement and feedback loops

As this regulatory system is newly established, transparency on how conditions will be reviewed, refined and updated over time would be beneficial. Clear indications of how provider and learner feedback will inform iterative improvement would help ensure the system remains proportionate, workable and aligned with sector developments.

Completeness of external assurance mechanisms

To present a full and accurate picture of how quality is safeguarded, the framework would benefit from explicitly referencing the full suite of external mechanisms already operating in Wales. These include cyclical Quality Enhancement Reviews, partial reviews, Institutional Liaison Visits and Concerns Investigations. Recognising these mechanisms within the conditions architecture would improve understanding of how assurance, risk identification and enhancement operate together.

Accuracy of QAA's role within system architecture

The section on "roles and responsibilities of others" currently provides only a partial description of QAA's work in Wales. A fuller account, reflecting our delivery of Quality Enhancement Reviews, partial and risk based reviews, Concerns Investigations, Institutional Liaison Visits and custodianship of UK sector reference points, would strengthen transparency and support a clearer understanding of external quality assurance arrangements.

B. Condition specific comments

Below we provide further detail on each condition to support proportionate and consistent implementation.

Welsh Language Condition

QAA agrees this condition can be applied consistently across the tertiary system, as the ambition to encourage greater use of Welsh and expand Welsh medium provision is relevant to all providers. Consistency in practice will, however, depend on recognising the diversity of provider types, learner cohorts and delivery models.

The requirements appear proportionate in intent, provided expectations continue to be interpreted in a way that allows for context sensitive, incremental development. Guidance will be needed on how progress should be evidenced, how the condition applies to diverse provision such as micro credentials and work based learning, and what constitutes "reasonable steps" in practice.

Clear alignment between this condition and Medr's developing National Plan for the Welsh Language would support coherent implementation and help ensure expectations are accompanied by appropriate support and capacity building.

The condition's purpose is strongly supported, but providers would benefit from further clarity on operational aspects, including evidence expectations, timescales for demonstrating progress, and application to partnership or subcontracted provision. Clarifying these areas would support consistent interpretation and avoid unnecessary burden.

Learner Protection Plans

QAA strongly supports applying this condition consistently across all providers, and the principle that lead providers retain responsibility for continuity of study in partnership arrangements. Further clarity will be needed, however, to support consistent implementation across diverse delivery contexts.

Proportionality will be enhanced by linking LPPs more explicitly to wider monitoring and assurance processes, including the identification of emerging risks through Annual Assurance Returns.

Providers would benefit from greater clarity on when an LPP should be activated, how risk thresholds will be determined, decision making responsibilities in partnership models, continuity of study expectations (including for learners with differing needs or circumstances), communication with learners during disruption, and how effectiveness will be evaluated. These clarifications would enable LPPs to operate as a preventative safeguard rather than a reactive compliance exercise.

Learner Engagement Code

QAA supports applying this condition consistently as a baseline expectation for all learners to influence provider decisions. The ambition aligns well with established partnership practice across the sector.

Proportionate implementation will depend on recognising existing learner engagement models, enabling flexibility across different forms of provision (including short form and work based learning), and ensuring that monitoring requirements are appropriate to context.

Providers would welcome further clarity on how meaningful learner influence should be evidenced, how learner representation fits within governance and assurance structures, expectations for feedback loops and closing the loop, and how the Code will be reviewed and developed collaboratively with providers and learners.

Validation Arrangements

The core principle that awarding providers retain responsibility for academic standards under all validation arrangements is strongly supported and can be applied consistently across the sector. Proportionality will be important, however, given the diversity of validation models and provider capacities.

Further operational clarity would assist providers in understanding expectations relating to due diligence, ongoing oversight, information sharing, monitoring, exit and teach out arrangements, and application to apprenticeships or regulated provision.

Extending guidance to reflect the wider partnership landscape, while maintaining clear legal distinctions, would help promote consistency and avoid potential regulatory gaps in complex delivery chains.

QAA would welcome the opportunity for follow up discussions with Medr on these ideas, and indeed all the comments and suggestions we have made, to support the continued development and implementation of the regulatory system and its associated conditions.

Do you have any further comments on the Quality Framework, in the context of the full set of regulatory documentation?

QAA welcomes the continued development of the Quality Framework and the progress made on previous iterations. In our previous response, we expressed support for its alignment with recognised quality assurance principles across the UK, its focus on proportionate regulation and its recognition of external reference points and self-evaluation. It is positive to see these elements retained and, in some areas, strengthened.

We also appreciate improvements to the structure and language of the Framework, including a clearer articulation of the seven pillars and greater visibility of learner experience and continuous improvement.

However, a number of areas highlighted in our earlier response remain, and greater clarity would support ease of effective implementation.

Strengthening the conceptual alignment

The definition of quality does not yet map clearly onto the seven pillars or the compliance requirements. Providers and other stakeholders would benefit from a more visible and coherent thread from expectations, to required evidence, to how judgements will be formed.

Balancing protection and enhancement

The Framework's emphasis on "threshold standards" may be interpreted as a minimum compliance model. A more explicit recognition of the importance of excellence and sustainable improvement to balance expectations would reinforce the system's enhancement ambitions.

Reinforcing externality

Externality currently appears to be understood largely in terms of external review processes. Further emphasis on peer input, reference to sector recognised standards and the use of wider UK and European benchmarks would help ensure credibility and consistency of quality judgements.

Learners as partners

While learner engagement is strengthened, there remains scope to develop a clearer articulation of learners as active partners in decision making and governance. Enhancing this would align with student partnership practice already well established across tertiary providers.

Welsh language and widening participation

These remain somewhat separated from the wider conception of quality. Integrating them more substantively into the core quality pillars would better reflect national priorities and strengthen alignment with statutory expectations.

Operational clarity for providers

Further guidance will be needed on the evidence and indicators that will be used to assess alignment with each pillar, to avoid variability in interpretation and disproportionate requirements.

Future readiness

As flexible and short form learning is expected to grow within the Welsh system, the Framework should signal more clearly how quality will be demonstrated across diverse modes of delivery.

Institutional Liaison Visits

Explicit reference to QAA's Institutional Liaison Visits within the Framework and the provision of relevant data from Medr's Annual Assurance Returns (see above – add cross-ref) to inform the visits would help with triangulation, embed early dialogue on emergent issues, promote reflection on quality assurance and enhancement arrangements, and aid identification of emerging risks as part of a preventative, system wide approach to quality.

Proportionate data sharing

Clearer articulation of proportionate data sharing between Medr and QAA, including access to relevant elements of Annual Assurance Returns and agreed datasets, would support effective triangulation between annual processes, monitoring, periodic review and enhancement activity while avoiding duplication for providers.

Concerns Investigation Process (Wales)

The Framework would benefit from explicitly recognising the Concerns Investigation Process (Wales), and concerns investigations as a targeted mechanism for addressing situations where quality or standards may be at risk, providing timely assurance without defaulting to full institutional review.

More accurate reflection of QAA's role

Under the section Roles and responsibilities of others, the Framework would benefit from a fuller and more accurate reflection of QAA's role within the Welsh quality system. This should include QAA's delivery of annual ongoing quality engagements (Institutional Liaison Visits), cyclical periodic Quality Enhancement Reviews, and as needed, partial and thematic reviews and concerns investigations.

With greater clarity of structure, alignment and evidence expectations, and with a more complete articulation of the external quality assurance mechanisms already operating in Wales, the Quality Framework has strong potential to act as a confident and enabling mechanism that supports both accountability and enhancement across the tertiary system.

QAA would welcome the opportunity for follow up discussions with Medr to explore these points, and indeed all the comments and suggestion we have made, in more detail and to support the further development of the Quality Framework. Continued dialogue would help ensure that the Framework is implemented in a way that is coherent, proportionate and supportive of both accountability and enhancement across the sector.

Learner Engagement Code

To what extent do you agree that the Learner Engagement Code sufficiently reflects the breadth of the tertiary education sector including the different contexts and requirements?

Agree

To what extent do you agree that the proposed principles for learner engagement address the key aspects of learner engagement?

Agree

To what extent do you agree the approach to monitoring is clear and proportionate?

Agree

To what extent do you agree providers would be able to meet the proposed evidence requirements without undue burden?

Agree

Please provide comments to support your responses:

QAA welcomes the intent behind the Learner Engagement Code and the ambition to ensure that all learners are able to contribute to quality and improvement across the tertiary system. However, further development would be helpful to ensure that the Code reflects sector breadth, supports established good practice and can be implemented proportionately and

confidently by providers.

The Code currently positions learners primarily as contributors of feedback. Providers across Wales already support learner partnership models where learners contribute to decision making and quality governance. Recognising this would better reflect the maturity of existing practice and strengthen alignment with wider UK quality principles. Clearer expectations on how learners can influence institutional decisions would also support consistency in how the Code is enacted.

There would be benefit in considering further how the Code applies to learners studying in different contexts. Short form, work based and collaborative delivery require different models of engagement from those used in longer programmes. Guidance that helps providers structure proportionate and meaningful engagement for diverse learner groups will be essential to avoid inconsistency and ensure parity of learner voice.

In addition, the approach to monitoring learner engagement is not yet fully clear. It would be helpful to outline what will be monitored routinely, the types of evidence expected, and how outcomes will be fed back to providers and learners. Clear feedback and improvement loops will support early action and make the monitoring process more transparent and supportive.

Overall, we support the direction of travel and believe the Code can act as an effective mechanism for strengthening the learner voice across the system. We would welcome further collaboration with Medr and the sector to ensure the Code reflects partnership practice, operates proportionately across providers and supports enhancement as well as assurance.

The Welsh Language

What do you think would be the likely positive or negative effects of our proposals on the Welsh language? We are particularly interested in any potential effects on opportunities to use Welsh and on not treating Welsh less favourably than English.

The proposals have the potential to deliver positive effects for the Welsh language by establishing clearer and more consistent expectations on tertiary education providers to support the development of Welsh medium provision and to encourage learners to use and develop their Welsh language skills across different levels and modes of study.

In particular, the explicit inclusion of a Welsh Language Code, alongside the requirement for providers to engage with the Welsh Language Commissioner through either the Welsh Language Standards or the Cynnig Cymraeg scheme, represents a meaningful and potentially powerful lever for strengthening the status and visibility of Welsh within the tertiary system. This provides a clearer regulatory signal that Welsh should not be treated less favourably than English and that language considerations form part of core institutional responsibility rather than discretionary activity.

The proposals could be further strengthened by providing greater clarity on how the Welsh language is embedded within each pillar of the Quality Framework in practice, rather than relying on high-level assertions. Making these linkages more explicit would help ensure that Welsh language considerations are consistently integrated into quality assurance, enhancement and monitoring activity, and are not perceived as an additional or peripheral requirement.

Overall, with clearer articulation of how Welsh language expectations operate across the regulatory framework, the proposals have the potential to support both increased

opportunities to use Welsh and a more systematic approach to ensuring parity of esteem within tertiary education.

Are there any other considerations for us to take into account, that would have a positive or an increased positive effect on: opportunities to use the Welsh language, and treating the Welsh language no less favourably than the English language.

A key consideration will be the development and implementation of Medr's National Plan for the Welsh Language. Ensuring that this Plan is clearly aligned with the Welsh Language Code, and that it provides practical support and resourcing for providers, will be important in translating regulatory ambition into sustained impact. Strong alignment between the Plan and the Code would help create coherence across policy, regulation and delivery, supporting increased opportunities to use Welsh and reinforcing the principle that Welsh should not be treated less favourably than English across the tertiary system.

Are there any other considerations for us to take into account, so that our proposals would not have adverse effects, or would reduce adverse effects on: opportunities to use the Welsh language, and treating the Welsh language no less favourably than the English language

An important consideration will be maintaining consistency of approach and terminology across the regulatory documentation when referring to the Welsh language, in order to support clarity and avoid confusion for providers. In particular, terms such as "Welsh medium" and "bilingual" should be used accurately and consistently, reflecting established sector understanding and policy usage.

While the ambition to expand opportunities to study through the medium of Welsh and to support learners at all levels to develop and use their Welsh language skills is welcome, it is also important to recognise the diversity of learner choice. Many Welsh speakers choose, for a range of reasons, not to study through the medium of Welsh. These learners should continue to have an excellent experience within the tertiary system, including opportunities to use Welsh socially and, where applicable under the Welsh Language Standards, to access services through the medium of Welsh or bilingually.

Ensuring that the regulatory framework remains mindful of these different learner pathways will help avoid unintended consequences and support a balanced approach that both promotes Welsh-medium learning and upholds the principle of treating Welsh no less favourably than English.

Impact on the Well-being of Future Generations Act (2015)

Will the proposals contribute to the achievement of the national well-being goals set out in the Well-being of Future Generations Act 2015?

Partially

Impact on equality, diversity and inclusion

Do the proposals take account of the need to:

Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010?

Partially

Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it?

Partially

Foster good relations between persons who share a protected characteristic and persons who do not share it?

Partially

Reduce the inequalities of outcome which result from socio-economic disadvantage?

Partially

If you have any further comments on the impact of the proposed regulations on equality, diversity and inclusion, please note:

The proposals demonstrate a clear intention to promote fairness, inclusion and learner protection across the tertiary education system, and many elements are aligned with the objectives of the Equality Act 2010 and broader equality and inclusion agendas.

Conditions relating to learner engagement, learner protection, staff and learner wellbeing and equality of opportunity have the potential to support more inclusive practice and improved outcomes for learners from underrepresented or disadvantaged backgrounds. The focus on proportionality and risk-based regulation also provides scope to recognise different provider contexts and learner needs.

However, the extent to which the proposals advance equality and reduce disparities in outcomes will depend on how they are implemented in practice. Clear guidance on expectations, attention to diverse learner circumstances, and flexibility in evidencing compliance will be important to avoid unintended barriers or disproportionate impacts.

Ongoing engagement with providers, learners and representative bodies will be essential to ensure that equality, diversity and inclusion considerations remain embedded throughout implementation and that the regulatory system supports positive and sustainable change across the sector.